BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

RECEIVED

AUG 17 4 01 PM '00

POSTAL DATE OF THE OFFICE OF THE OFFI DELIVERY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE NATIONAL NEWSPAPER ASSOCIATION REDIRECTED FROM WITNESS PATELUNAS (NNA/USPS-ST44-1)

The United States Postal Service hereby moves for late acceptance of Response of United States Postal Service to Interrogatories of the National Newspaper Association Redirected from Witness Patelunas (NNA/USPS-ST44-1).

The response should have been filed on Monday, August 14, 2000. It is thus three business days late. This brief delay was caused by the press both of responding to numerous interrogatories and questions raised in technical conferences and hearings concerning the Postal Service's response to Order No. 1294, and of preparing rebuttal testimony. The Postal Service regrets any inconvenience.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990 Fax –5402 August 17, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990 Fax –5402 August 17, 2000